

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

JOLLENTA PLUMMER, individually and on behalf of all others similarly situated,)	Case No.: 3:21-cv-00648-FDW-DSC
)	<u>COLLECTIVE ACTION</u>
Plaintiffs,)	
)	
v.)	PLAINTIFF KIRSTEN
)	CAVANAUGH'S NOTICE OF
TMC RESTAURANT OF CHARLOTTE, LLC dba MEN'S CLUB OF CHARLOTTE, a North Carolina Limited Liability Company;)	ACCEPTANCE OF DEFENDANTS'
LLOYD J ACE, III, an individual; ABDUR)	FED. R. CIV. P. 68 OFFER OF
RASCHID CHAWDHARY, an individual;)	JUDGMENT
DOE MANAGERS 1 through 3; and DOES 4)	
through 10, inclusive,)	
)	
Defendants.)	
)	

NOW COMES plaintiff Kirsten Cavanaugh (“Plaintiff” or “Cavanaugh”), by and through undersigned counsel, and hereby submits her Notice of Acceptance of defendants TMC Restaurant of Charlotte, LLC dba Men’s Club of Charlotte, Lloyd J. Ace III, and Abdur Raschid Chawdhary’s (collectively, “Defendants”) Fed. R. Civ. P. 68 Offer of Judgment as follows:

1. Cavanaugh joined this matter on December 22, 2021. *See* Dkt. 10.
2. On July 5, 2022, this Court issued its Order Granting Joint Motion to Stay Claims of Plaintiff Kirsten Cavanaugh Pending Arbitration and stayed Plaintiff’s claims. *See* Dkt. 16.
3. On July 11, 2022, Defendants served Plaintiff with a Fed. R. Civ. P. 68 Offer of Judgment in this action in the amount of \$6,000, inclusive of Plaintiff’s attorneys’ fees and costs. *See* Exhibit 1.

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4. Pursuant to Fed. R. Civ. P. 68, Plaintiff timely serves written notice of her acceptance of the offer via the Court's CM/ECF electronic filing system to Defendants' attorneys of record.

Dated: July 11, 2022

Respectfully submitted,

/s/ Jesenia A. Martinez
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*Attorneys for Plaintiffs and all others
similarly situated*

CERTIFICATE OF SERVICE

I certify that on Monday, July 11, 2022 a true and correct copy of the attached **PLAINTIFF KIRSTEN CAVANAUGH'S NOTICE OF ACCEPTANCE OF DEFENDANTS' FED. R. CIV. P. 68 OFFER OF JUDGMENT** and accompanying document were served via CM/ECF upon the following parties pursuant to Rule 5 of the Federal Rules of Civil Procedure:

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Counsel for All Defendants

/s/ Jesenia A. Martinez

Jesenia A. Martinez